

EXHIBIT 1

Exhibit 1**Summary Chart of the RFPs at Issue & Discovery The Times Agreed to Produce**

The Discovery Requests at Issue	Discovery The Times Agreed to Produce
Section A: Revenue and Web Traffic	
<p>OAI RFP 141: Documents and Communications reflecting or Relating to decreases in revenue generated by Wirecutter recommendations, if any, including but not limited to Documents Regarding the reasons for such decreases.</p> <p>OAI RFP 142: Documents and Communications Relating to any decreases in traffic to Wirecutter from January 1, 2018 through the present, if any, including but not limited to Documents Regarding the reasons for such decreases.</p> <p>OAI RFP 143: Documents and Communications Relating to any decreases in traffic to The Athletic from January 1, 2016 through the present, if any, including but not limited to Documents Regarding the reasons for such decreases.</p> <p>OAI RFP 144: Documents and Communications Relating to decreases in traffic to NYT Cooking from January 1, 2018 through the present, if any, including but not limited to Documents Regarding the reasons for such decreases.</p> <p>OAI RFP 145: Documents and Communications Regarding Your efforts to ascertain whether decreases, if any, in traffic to Your sites (including but not limited to The New York Times, Wirecutter, The Athletic, and NYT Cooking) is attributable to GPT Services versus other market forces and factors.</p> <p>OAI RFP 146: Documents and Communications Relating or referring to decreases in revenue, if any, generated by The Athletic subscriptions, including but not limited to Documents Regarding the reasons for such decreases.</p> <p>OAI RFP 147: Documents and Communications Relating or referring to</p>	<ul style="list-style-type: none"> • Documents sufficient to show decreases in traffic to Wirecutter from 2018 to present; • Documents sufficient to show decreases in traffic to The Athletic from the date of sale in 2022 to present; • Documents sufficient to show decreases in traffic to NYT Cooking from 2018 to present; • Analyses and reports regarding whether decreases in traffic to Times websites, if any, are attributable to GPT Services versus other market forces and factors; • Documents sufficient to show the total page views for each of the digital versions of the Copyrighted Works-In-Suit, from January 1, 2018 (or the first publication of the work, whichever is later), through the first quarter of 2024; • Documents sufficient to show the total user visits to www.nytimes.com, on a monthly basis, from January 1, 2018, through the first quarter of 2024; • Documents sufficient to show the number of active Times subscribers for each month beginning January 1, 2018, through the first quarter of 2024; • Documents sufficient to show The Times's subscription-based revenue for each month from January 1, 2018, through the first quarter of 2024; • Documents sufficient to show The Times's total revenue, broken down by source, including without limitation advertising revenue, revenue from affiliate links, and subscription revenue by subscription type (whether personal or commercial, online or print) for each month beginning January 1, 2018, through the first quarter of 2024; • Documents sufficient to calculate or estimate per display revenues associated with the Asserted Works by source, including without limitation revenues from subscriptions advertising revenues (including cost per impression), and revenues from affiliate links, including (i) the total amount since the work's

decreases in revenue, if any, generated by NYT Cooking subscriptions.

OAI RFP 148: Documents and Communications referring or Relating to any factors that allegedly negatively impacted revenue from January 1, 2018 through the present, including but not limited to advertising and subscription revenue.

MS RFP 80: Documents concerning the decision to include a question about AI in any surveys regarding cancellation of any subscription to The New York Times, whether print or digital, (including but not limited to the survey attached as Exhibit A), including but not limited to documents sufficient to show when any questions about AI were added to or removed from any such surveys.

MS RFP 89: Documents concerning reasons for any changes in advertising revenue associated with or resulting from page views within the nytimes.com domain (including all webpages within the nytimes.com domain) from January 1, 2019 to the present.

MS RFP 101: Documents concerning any effect (including but not limited to increases, decreases, fluctuations, or changes) on traffic to the nytimes.com domain (including all webpages within the nytimes.com domain) resulting from non-party Generative AI System(s) similar to the Generative AI Products and Services, including but not limited to any version of Anthropic's Claude, Google's Search (with integrated AI) and Google's Gemini (formerly Bard), and Perplexity.

publication, and (ii) a breakdown of the amount of revenue by month from month of publication to the present; and

- Results of any survey that allows users cancelling their subscription to select "AI makes my subscription unnecessary" or that otherwise takes Gen AI into consideration.

Section B: Market for Works - Licensing

OAI RFP 18: All Documents and Communications relating to any arrangement or agreement by which You permitted a third party to reproduce or display Your Asserted Works, or any part thereof, in print or on the Internet, regardless of whether the arrangement or

- Licensing agreements for the Asserted Works, regardless of whether those licenses relate to generative AI;
- Documents sufficient to show all attempts to license the Asserted Works for training of or use with Generative AI products and services;

agreement was commercial or non-commercial.

OAI RFP 33: All Documents and Communications relating to licenses or attempts to license Your Asserted Works for reproduction, preparation of derivative works, distribution, display, or performance by businesses (including, but not limited to, artificial intelligence companies, academic institutions, non-profit organizations, or other legal entities), including without limitation enterprise licenses, archive licenses, Generative AI licenses, and licenses for text and data mining.

OAI RFP 160: Documents and Communications Relating to the market for licensing or use of Your Asserted Works for purposes of analyzing language patterns [sic.] or training any large language model (“LLM”), if any, including but not limited to Documents Relating to the presence of absence of such a market, Documents sufficient to identify such a market, when and how it first developed, the Persons involved, and any Documents Relating to actual or potential the licensing or use of Your Asserted Works in such market(s).

OAI RFP 161: Documents and Communications Concerning whether Your Asserted Works have ever been used for the purpose of analyzing language patterns.

MS RFP 8: Documents concerning the market for the Copyrighted Works-In-Suit, including Documents sufficient to show Your consumer base, gross revenues, overall market performance, market performance for purchases of print publications, market performance for purchases of digital publications, supply and demand, advertisement performance, or any related market studies or research, both before and after release of Defendants’ Generative AI Product(s) and Service(s).

MS RFP 9: Documents concerning the market for derivatives of Your Copyrighted

- Communications related to executed and contemplated agreements to license Times’ works to train generative AI models;
- Documents and communications regarding attempts to license or negotiate Times works to Defendants for use in their generative AI tools;
- Documents sufficient to show the “well-established market for The Times to provide paid access to and use of the Asserted Works;” and
- All documents and communications related to both executed and contemplated agreements to license Times works to train generative AI models.

Works-In-Suit, including Documents sufficient to show Your consumer base, gross revenues, overall market performance, market performance for purchases of print publications, market performance for purchases of digital publications, supply and demand, advertisement performance, or any related market studies or research, to the extent such market exists, both before and after release of Defendants' Generative AI Product(s) and Service(s).

Section C: The Times's Use of GenAI

MS RFP 31: Documents concerning the Training and Fine-Tuning of the Your "generative AI ad tool" that is referenced in the February 20, 2024, Axios article titled "Exclusive: NYT plans to debut new generative AI ad tool later this year."

MS RFP 32: Documents concerning the Training and Fine-Tuning of any other Generative AI Model developed, used, or considered for use by You.

- Documents regarding The Times's A.I. Initiatives program;
- Documents sufficient to show The Times's past, present, and future efforts to use generative AI in the reporting or presentation of content;
- Documents sufficient to show any training programs The Times is implementing or has implemented about generative AI;
- Documents regarding The Times's policies and procedures regarding the use of Defendants' generative AI tools; and
- Documents regarding Defendants' generative AI tools that The Times uses in its reporting or presentation of content.